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ATTORNEYS FOR DEBTOR

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: CAMPISI CONSTRUCTION, INC. <i>Debtor.</i>	Chapter 11 Bankruptcy No.: 14-12458-JKF
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**DEBTOR'S OBJECTION TO PROOF OF CLAIM #21 FILED BY ALEX W.
MCCONNELL**

1. On or about March 31, 2014, Campisi Construction, Inc. ("Debtor") filed the instant case under Chapter 11 of the Bankruptcy Code.
2. On or about August 26, 2014, Alex W. McConnell, a former employee of Debtor, ("McConnell") filed an unsecured non-priority Proof of Claim for \$20,000, Claim #21 ("Claim"), a true and correct copy of this Claim is attached hereto as Exhibit "A."
3. According to the Claim, the \$20,000 arises from "payroll, expenses and loan agreed upon by Debtor."
4. According to Debtor's records, Debtor owes McConnell \$1,578.41 relating to unpaid services.
5. McConnell attaches no documents to the Claim. Any request for payment based on expenses or money loaned should be supported by a written agreement(s). Here. McConnell

attaches no written agreements to the Claim, and therefore has not filed any proof to establish a prima facie claim.

WHEREFORE, Debtor requests that the court reduce Claim #21 filed by Alex W. McConnell, to \$1,578.41.

Respectfully submitted,

By: /s/ Dimitri L. Karapelou, Esq.
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Date: October 16, 2014